

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD., on
behalf of itself and all others similarly situated,

Plaintiff,

- against -

BARCLAYS BANK PLC, BARCLAYS CAPITAL
INC., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A.,
DEUTSCHE BANK AG, LLOYDS BANKING
GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, UBS AG AND JOHN DOE
NOS. 1-50,

Defendants.

No. 15-cv-03538 (VSB)

ECF Case

**NOTICE OF MOTION TO DISMISS
CONSOLIDATED
AMENDED COMPLAINT**

ORAL ARGUMENT REQUESTED

FRONTPOINT EUROPEAN FUND, L.P., and
RICHARD DENNIS, on behalf of themselves and
all others similarly situated,

Plaintiffs,

- against -

BARCLAYS BANK PLC, BARCLAYS CAPITAL
INC., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A.,
DEUTSCHE BANK AG, LLOYDS BANKING
GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, UBS AG, AND JOHN DOE
NOS. 1-50,

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Marc J. Gottridge,
dated April 11, 2016, and the exhibits thereto; the accompanying Declaration of David R.
Gelfand, dated April 11, 2016, and the exhibit thereto; the accompanying Declarations of Allison

Cambria, dated April 11, 2016; John Connors, dated November 2015; Patrick Gonsalves, dated November 12, 2015; Jennifer Lobato-Church, dated April 11, 2016; Kevin P. McKendry, dated April 5, 2016; Joseph P. Randazzo, dated April 8, 2016; and Andrew Sherman, dated April 8, 2016; the Memorandum of Law in Support of Defendants' Motion to Dismiss the Consolidated Amended Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim, dated April 11, 2016; the Memorandum of Law in Support of Foreign Defendants' Motion to Dismiss for Lack of Personal Jurisdiction, dated April 11, 2016; and all prior pleadings and papers filed in this action, Defendants Barclays Bank plc, Barclays Capital Inc., Coöperatieve Rabobank U.A. (f/k/a Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A.), Deutsche Bank AG, Lloyds Banking Group plc, The Royal Bank of Scotland plc, and UBS AG (collectively, "Defendants"), by their respective undersigned attorneys, will move this Court, before the Honorable Vernon S. Broderick, United States District Judge, in Courtroom 518 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and at a time to be determined by the Court, pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing, as against Defendants, all claims in Plaintiffs' Consolidated Amended Complaint, filed on February 25, 2016 (Dkt. No. 95), and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, as set forth in this Court's Order dated February 19, 2016 (Dkt. No. 93), any papers in opposition to this motion shall be filed and served no later than May 26, 2016.

Dated: New York, New York
April 11, 2016

/s/ Jonathan D. Schiller*

Jonathan D. Schiller
Leigh M. Nathanson
BOIES, SCHILLER & FLEXNER LLP
575 Lexington Avenue
New York, New York 10022
Tel: (212) 446-2300
jschiller@bsfllp.com
lnathanson@bsfllp.com

Michael A. Brille
Melissa Felder Zappala
5301 Wisconsin Avenue NW
Washington, D.C. 20015
Tel: (202) 237-2727
mbrille@bsfllp.com
mzappala@bsfllp.com

/s/ David H. Braff*

David H. Braff
Yvonne S. Quinn
Jeffrey T. Scott
Matthew J. Porpora
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Tel: (212) 558-4000
braffd@sullcrom.com
quinny@sullcrom.com
scottj@sullcrom.com
porporam@sullcrom.com

*Attorneys for Defendants Barclays Bank PLC
and Barclays Capital Inc.*

/s/ David R. Gelfand*

David R. Gelfand
Sean M. Murphy
Mark D. Villaverde
MILBANK TWEED HADLEY &
McCLOY LLP
28 Liberty Street
New York, New York 10005
Tel.: (212) 530-5000
dgelfand@milbank.com
smurphy@milbank.com
mvillaverde@milbank.com

*Attorneys for Defendant Coöperatieve
Rabobank U.A. (f/k/a Coöperatieve
Centrale Raiffeisen-Boerenleenbank B.A.)*

/s/ Moses Silverman*

Moses Silverman
Andrew C. Finch
Noam Lerer
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 373-3355
msilverman@paulweiss.com
afinch@paulweiss.com
nlerer@paulweiss.com

Attorneys for Defendant Deutsche Bank AG

/s/ Marc J. Gottridge

Marc J. Gottridge
Lisa J. Fried
Kevin T. Baumann
Benjamin A. Fleming
HOGAN LOVELLS US LLP
875 Third Avenue
New York, New York 10022
Tel: (212) 918-3000
marc.gottridge@hoganlovells.com
lisa.fried@hoganlovells.com
kevin.baumann@hoganlovells.com
benjamin.fleming@hoganlovells.com

*Attorneys for Defendant Lloyds Banking
Group plc*

/s/ Peter Sullivan*

Peter Sullivan
Lawrence J. Zweifach
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166
Tel: (212) 351-4000
psullivan@gibsondunn.com
lzweifach@gibsondunn.com

Joel S. Sanders (*admitted pro hac vice*)
555 Mission Street, Suite 3000
San Francisco, California 94105
jsanders@gibsondunn.com

Attorneys for Defendant UBS AG

/s/ Fraser L. Hunter, Jr.*

Fraser L. Hunter, Jr.
David S. Lesser
Jamie Dycus
WILMER CUTLER PICKERING
HALE AND DORR LLP
250 Greenwich Street
New York, New York 10007
Tel: (212) 230-8800
fraser.hunter@wilmerhale.com
david.lesser@wilmerhale.com
jamie.dycus@wilmerhale.com

*Attorneys for Defendant The Royal Bank of
Scotland plc*

*Electronic signatures used with permission.

TO: Geoffrey M. Horn
Lowey Dannenberg Cohen & Hart, P.C.
One North Broadway
White Plains, New York 10601
Tel: (914) 997-0500
ghorn@lowey.com

Christopher Lovell
Lovell Stewart Halebian Jacobson LLP
61 Broadway, Suite 501
New York, New York 10006
Tel: (212) 608-1900
clovell@lshllp.com

Attorneys for Plaintiffs